



Via ECFS Filing

September 11, 2008

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: Certification of CPNI Filing, EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to section 64.2009(e) of the Commission's rules⁷ and the Commission's *Public Notice*, DA 08-171, dated January 29, 2008 in the above-captioned matter, X5 Solutions, Inc. hereby submits its late-filed 2007 and 2008 compliance certificate and a statement explaining how the Company's operating procedures ensure compliance with the referenced regulations.

By the attached Certificate and my signature below, I hereby certify to the Commission X5 Solutions, Inc. has established, and strictly follows, policies and operating procedures to fully comply with section 64.2009 of the Commission's rules governing Customer Proprietary Network Information ("CPNI").

X5 Solutions, Inc. has established policies, which expressly prohibit release of CPNI to any employee not directly involved in the provision of service to the customer, subject to disciplinary action and termination of employment. Each employee receives an initial CPNI protection briefing and annual CPNI protection requirement reviews thereafter. All employees are strictly held to non-disclosure obligations.

CPNI data is accessible only to those employees with a "need to know" for purposes of serving current subscribers. The Company does not sell, or otherwise release, CPNI to other entities under any circumstances. All contact with customers is documented through retention of electronic copies of communications and retention of any scripts used if contacting subscribers telephonically, for a minimum period of one year. All sales or marketing campaigns initiated by the Company require my approval; I am responsible for ensuring that each campaign strictly complies with the Commission's CPNI regulations.

Questions regarding this matter may be directed to me.

Sincerely,

X5 Solutions, Inc.,

A handwritten signature in black ink, appearing to read 'Nathan Bledsoe', written over a horizontal line.

Nathan Bledsoe
Chief Operations Officer

⁷ 47 C.F.R. §64.2009(e).

Annual 47 C.F.R. S: 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007.

Date filed: September 11, 2008

Name of company covered by this certification: X5 Solutions, Inc.

Form 499 Filer ID: 824876

Name of signatory: Nathan Bledsoe

Title of signatory: Chief Operations Officer

I, Nathan Bledsoe, certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. S: 64.2001 et seq.*

Attached to this certification is a transmittal letter containing an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The Company has not taken, nor been compelled to take, any actions* against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

X5 Solutions, Inc.

Signed



Nate Bledsoe
Chief Operations Officer
1501 4th Avenue, Suite 303
Seattle, WA 98101
Telephone: 206.839.4059

* Proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers.

Annual 47 C.F.R. S: 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008.

Date filed: September 11, 2008

Name of company covered by this certification: X5 Solutions, Inc.

Form 499 Filer ID: 824876

Name of signatory: Nathan Bledsoe

Title of signatory: Chief Operations Officer

I, Nathan Bledsoe, certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. S: 64.2001 et seq.*

Attached to this certification is a transmittal letter containing an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The Company has not taken, nor been compelled to take, any actions* against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

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